

George A. Davis, Esq.
Andrew M. Troop, Esq.
Christopher R. Mirick, Esq.
CADWALADER, WICKERSHAM & TAFT LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6000
Facsimile: (212) 504-6666

FEB 04 2011

Counsel to the Appellant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LYONDELL CHEMICAL COMPANY, et al.,

Debtors.

MILLENNIUM HOLDINGS LLC,

Appellant,

-against-

AKZO NOBEL PAINTS, LLC,

Appellee.

Chapter 11

Case No. 09-10023 (REG)

Jointly Administered

Case No. 1:11-cv-00163-MGC

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Christopher R. Mirick, a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States District Court for the Southern District of New York and a member of the law firm of Cadwalader Wickersham & Taft LLP (“CWT”), hereby moves this Court to enter an order permitting Catherine R. Connors to practice *pro hac vice* before the United States District Court

2011 FEB -4 PM 3:51
FEB 11 2011
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

for the Southern District of New York in the above captioned cases. In support thereof, I respectfully represent as follows:

Ms. Connors is Partner at Pierce Atwood LLP, in Portland, Maine, a member in good standing of the Bar of the State of Maine.

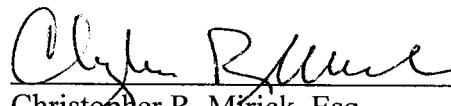
Ms. Connors agrees to pay the fee of \$25.00 upon the filing of this motion for an order admitting him to practice *pro hac vice* in this appeal from the Debtors' chapter 11 cases. Ms. Connors's address is: Pierce Atwood LLP, One Monument Square, Portland, ME 04101. Ms. Connors's e-mail address is cconnors@pierceatwood.com and his telephone number is (207) 791-1389. There is no pending disciplinary proceeding against Ms. Connors in any State or Federal Court.

Dated: New York, New York

January _____, 2011

February 4, 2011

Respectfully Submitted,



Christopher R. Mirick, Esq.
Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6000
Facsimile: (212) 504-6666
christopher.mirick@cwt.com

George A. Davis, Esq.
Andrew M. Troop, Esq.
Christopher R. Mirick, Esq.
CADWALADER, WICKERSHAM & TAFT LLP
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6000
Facsimile: (212) 504-6666

Counsel to the Appellant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LYONDELL CHEMICAL COMPANY, et al.,

Debtors.

MILLENNIUM HOLDINGS LLC,

Appellant,

-against-

AKZO NOBEL PAINTS, LLC,

Appellee.

Chapter 11

Case No. 09-10023 (REG)

Jointly Administered

Case No. 1:11-cv-00163-MGC

**DECLARATION OF CHRISTOPHER R. MIRICK IN
SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, Christopher R. Mirick hereby declares as follows:

Christopher R. Mirick, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Cadwalader, Wickersham & Taft LLP, counsel for Appellant,

Millennium Holdings, LLC, in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and

in support of Appellant's motion to admit Catherine R. Connors as counsel *pro hac vice* to represent Appellant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2008. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Ms. Connors since 2010.

4. Ms. Connors is a Partner at Pierce Atwood LLP, in Portland, Maine.

5. I have found Ms. Connors to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Ms. Connors, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Ms. Connors, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Catherine R. Connors, *pro hac vice*, to represent Appellant in the above captioned matter, be granted.

Dated: New York, New York

January 4, 2011

February 4, 2011

Respectfully Submitted,


Christopher R. Mirick, Esq.

BOARD OF OVERSEERS OF THE BAR*Established by the Maine Supreme Judicial Court*

Jud Knox, Chair
David M. Sanders, Esq., Vice Chair

Gregory T. Caswell
Charles E. Gilbert III, Esq.
Dawn M. Pelletier, Esq.
Daniel Pileggi, Esq.
Stephen J. Schwartz, Esq.

97 Winthrop Street
P O Box 527
Augusta, ME 04332-0527

Phone 207-623-1121 • Fax 207-623-4175
Email: Board@mebaroverseers.org • Web: www.mebaroverseers.org

BOARD STAFF

EXECUTIVE DIRECTOR
Jacqueline M. Rogers

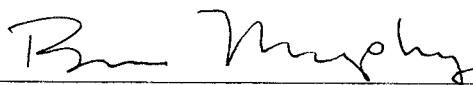
BAR COUNSEL
J. Scott Davis

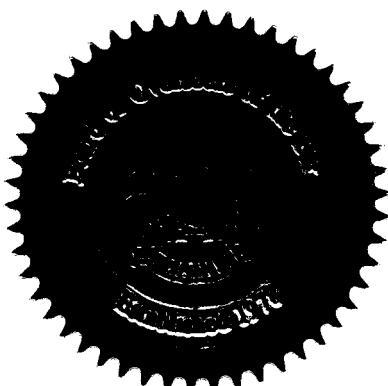
ASSISTANT BAR COUNSEL
Aria Eee
Jacqueline L.L. Gomes

CERTIFICATE OF GOOD STANDING**Catherine R. Connors, Esq.**

This is to certify that according to the registration records of Maine's Board of Overseers of the Bar, Catherine R. Connors, of Portland, State of Maine, Bar # 003400 was admitted to the Maine Bar on August 5, 1986 and is presently registered and in good standing with the Board of Overseers of the Bar as an active practitioner.

Dated at Augusta, County of Kennebec, State of Maine on January 21, 2011.



Brian Murphy, Board Clerk



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS
www.iardc.org

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333
Springfield, IL 62701
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Catherine R. Connors
Pierce Atwood LLP
One Monument Square
Portland, ME 04101-1110

(Via Facsimile / Regular Mail)

Chicago
Tuesday, January 25, 2011

In re: Catherine R. Connors
Attorney No. 6188810

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois on 12/4/1984; has never been disciplined; and is registered as inactive for 2011.

Very truly yours,
Jerome Larkin
Administrator

By: 

Thomas W. Peters
Registrar

TWP

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LYONDELL CHEMICAL COMPANY, et al.,

Debtors.

Chapter 11

Case No. 09-10023 (REG)

Jointly Administered

MILLENNIUM HOLDINGS LLC,

Appellant,

-against-

AKZO NOBEL PAINTS, LLC,

Appellee.

Case No. 1:11-cv-00163-MGC

Please take notice that upon the motion of Christopher R. Mirick and said sponsor attorney's declaration in support,

IT IS HEREBY ORDERED that Catherine R. Connors, Esq. of Pierce Atwood LLP, One Monument Square, Portland, ME 04101 (Telephone number: (207) 791-1389, e-mail address: cconnors@pierceatwood.com) is admitted *pro hac vice* as counsel for the Appellant in the above-captioned case pending in the United States District Court for the Southern District of New York. All Attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.com.

Dated: New York, New York
February ___, 2011

UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LYONDELL CHEMICAL COMPANY, et al.,

Debtors.

MILLENNIUM HOLDINGS LLC,

Appellant,

-against-

AKZO NOBEL PAINTS, LLC,

Appellee.

STATE OF NEW YORK:

: SS

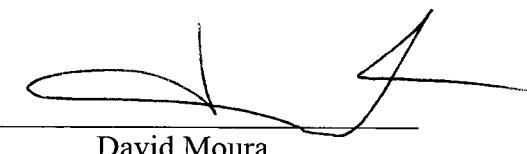
COUNTY OF NEW YORK:

David Moura, being duly sworn, deposes and says:

1. I am not a party to this action, am over 18 years of age and am employed by Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, NY 10281.
2. On the 4th day of February, 2011, I served a true and correct copy of the
 - Motion to Admit Counsel *Pro Hac Vice*

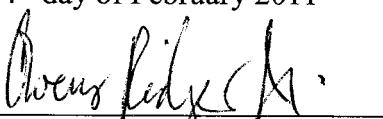
by depositing a true copy thereof enclosed in an official depository under the exclusive care and custody of the US Postal service, addressed to the following:

Michael E. Wiles, Esq.
Derek P. Alexander, Esq.
Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022



David Moura

Sworn to before me on this
4th day of February 2011



Owens Ridges Jr.

OWENS RIDGES JR
Notary Public, State of New York
No. 24-4992070

Qualified in Kings County
Certificate Filed in New York County
USAO Commission Expires February 18, 2014